

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO ETHICON WAVE 1 MOTIONS	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR RECONSIDERATION OF
THE COURT'S ORDER OF AUGUST 26, 2016 LIMITING OR EXCLUDING THE
EXPERT OPINIONS OF DR. JERRY BLAIVAS, M.D.**

PLEASE TAKE NOTICE that on _____, or as soon thereafter as the motion may be heard in the above entitled Court located at Robert C. Byrd United States Courthouse, 300 Virginia Street, East, Suite 2400, Charleston, West Virginia 25301, Plaintiffs move this Court for reconsideration of its August 26, 2016 order and move that the expert opinions Dr. Jerry Blaivas ("Dr. Blaivas") proffered in Wave 1 of this litigation be admitted as set forth in the Memorandum in Support of Plaintiffs' Motion for Reconsideration of the Court's Order of August 26, 2016 Limiting or Excluding the Expert Opinions of Dr. Jerry Blaivas, M.D., filed contemporaneously with this Motion, along with the exhibits attached thereto.

This motion will be made and is based on this Notice of Motion and Motion, the Memorandum, and upon such other matters as may properly come before the Court at the hearing hereof.

Date: November 3, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2016, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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